

OUR PERSONAL DATA PROTECTION UNDERTAKING: “INFORMED PERSONS AND PROTECTED DATA”

The Management / Governing Body of **TRUJILLO 2000, S.L.** (from now on, the data controller), assumes the maximum responsibility and commitment with the establishment, implementation and maintenance of this Data Protection Policy, guaranteeing the continuous improvement of the data controller with the aim of achieving excellence in relation to the compliance with Regulation (EU) 2016/679 of the European Parliament and the Council, of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free circulation of these data and repealing Directive 95/46/EC (General Data Protection Regulation) (OJEU L 119/1, 04.05.2016), and of the Spanish regulations on the protection of personal data (Organic Law, specific sectorial legislation and its implementing rules)

The Data Protection Policy of **TRUJILLO 2000, S.L.** is based on the principle of proactive responsibility, according to which the data controller is responsible for compliance with the regulatory and jurisprudential framework that governs said Policy, and is able to demonstrate this to the competent control authorities.

In this regard, the data controller shall follow the following principles which should serve as a guide and framework for all his staff in the processing of personal data:

1. Design of Data protection: the data controller shall, both when determining the means of processing and at the time of the processing itself, implement appropriate technical and organizational measures, such as pseudonymisation, designed to apply effectively data protection principles such as data minimization and to integrate the necessary guarantees into the processing.
2. Default data protection: the controller shall implement appropriate technical and organizational measures to ensure that, by default, personal data are processed only if they are necessary for each specific purpose of the processing.
3. Data protection during information life: measures ensuring the protection of personal data shall be applicable throughout the entire life cycle of the information.
4. Legality, loyalty and transparency: personal data will be treated in a lawful, loyal and transparent manner in relation to the interested party.
5. Purpose limitation: personal data shall be collected for specified, explicit and legitimate purposes and shall not be further processed in a way incompatible with those purposes.
6. Minimization of data: personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
7. Accuracy: personal data must be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that personal data which are inaccurate in relation to the purposes for which they are processed are deleted or rectified without delay.

8. Limitation of storage time: personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes of the processing of the personal data.
9. Integrity and confidentiality: personal data shall be processed in a way that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, through the implementation of appropriate technical or organizational measures.
10. Information and training: one of the keys to guaranteeing the protection of personal data is the training and information provided to the personnel involved in the processing of such data. During the life cycle of the information, all personnel with access to the data will be properly trained and informed about their obligations in relation to compliance with data protection regulations.

The Data Protection Policy of **TRUJILLO 2000, S.L.** is communicated to all personnel of the data controller and made available to all interested parties.

Consequently, this Data Protection Policy involves all the personnel of the data controller, who must know and assume it, considering it as their own, each member being responsible for applying it and verifying the data protection rules applicable to their activity, as well as identifying and providing the improvement possibilities that they consider appropriate in order to achieve excellence in relation to its compliance.

This Policy will be reviewed by the Management / Governing Body of **TRUJILLO 2000, S.L.**, as many times as deemed necessary, in order to comply, at all times, with the provisions in force regarding personal data protection.